

EXHIBIT 5

CONFIDENTIAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re Wells Fargo Mortgage) Case No.
Discrimination Litigation) 3:22-cv-00990-JD
_____)

(CONFIDENTIAL)

VIDEOTAPED DEPOSITION OF BRYAN A. BROWN

DATE: Tuesday, October 10, 2023
TIME: 9:59 a.m.
HELD AT: Regus
71 Raymond Road
West Hartford, Connecticut

Reported by:
Sarah J. Miner, RPR, LSR #238
JOB No. 6109549

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1 high school. 10:31

2 A Completed high school. 10:31

3 Q Did you attend any college? 10:31

4 A Some college. 10:31

5 Q Where was that? 10:31

6 A Central Connecticut State University. 10:31

7 Q Do you have any degrees beyond high 10:31

8 school? 10:31

9 A No. 10:31

10 Q Can you tell me about your professional 10:31

11 background? 10:31

12 A Can you elaborate? 10:32

13 Q Sure. I know from looking at the 10:32

14 documents that you had worked at the same place for 10:32

15 a long time as of October 2020. But if you can 10:32

16 walk me through, if that was your first 10:32

17 professional job and how long you were there. 10:32

18 A I don't think I heard it mentioned it like 10:32

19 that a professional job. Yes, I guess that was my 10:32

20 first professional jobs. I had some jobs before 10:32

21 that. 10:32

22 Q I have in these depositions where they had 10:32

23 jobs at Radio Shack or Burger King. We don't need 10:32

24 to go there. 10:32

25 Where were you working in October 2020? 10:32

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1 A I was working at Kuegler Associates. 10:32

2 Q What is Kuegler Associates? 10:32

3 A A consulting engineering firm. 10:32

4 Q What do you do for Kuegler Associates? 10:32

5 A I design plumbing and electrical systems. 10:32

6 Q How long have you worked there? 10:32

7 A Since October of 2020 and still through 10:33

8 the present. 10:33

9 Q When did you start working there? 10:33

10 A Full time was October 2020 [sic]. I think 10:33

11 maybe a few months before that earlier in that year 10:33

12 as part-time and then it transitioned to full time. 10:33

13 Q Had you worked at Kuegler -- I thought I 10:33

14 had seen somewhere in the notes you worked at 10:33

15 Kuegler for 18 years, as of October 2020. Did I 10:33

16 miss remember that? 10:33

17 A I am sorry. 2002. Yes. 10:33

18 Q Okay. I thought something was amiss. 10:33

19 A Yes, I was very much full time at 2020. 10:33

20 Q Got it. In October 2020, did you have an 10:33

21 adjustment of your hours? 10:33

22 A Yes. 10:33

23 Q Can you tell me about that. 10:33

24 A My son -- my first son had just been born, 10:33

25 and I just wanted to have a few more hours at home 10:33

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1 in the morning or in the afternoon, so I just 10:34
2 reduced my hours to be able to accommodate. 10:34
3 Q Do you recall the time period that you had 10:34
4 the reduced hours? 10:34
5 A When I started the reduced hours, probably 10:34
6 summer of 2020, just before his birth, and still 10:34
7 maintaining reduced hours. 10:34
8 Q Now? 10:34
9 A Now currently. 10:34
10 Q So starting summer of 2020 and through the 10:34
11 present? 10:34
12 A Yes. 10:34
13 Q And what are your decreased hours? 10:34
14 A I am working 32 hours. 10:34
15 Q Where do you currently reside? 10:34
16 A [REDACTED] in Bristol. 10:34
17 Q Is that the property you sought to 10:34
18 refinance in this lawsuit? 10:35
19 A Yes, it is. 10:35
20 Q When did you buy the property originally? 10:35
21 A December of 2010 -- yes, December of 2010. 10:35
22 Q It is a multi-unit property. Is that 10:35
23 right? 10:35
24 A Yes. 10:35
25 Q Do you recall how much you paid for the 10:35

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1	property in 2010?	10:35
2	A Not an exact number. 204 or -- I think	10:35
3	the purchase was 204,000. I could be a little off.	10:35
4	I want to say the finance amount was 197,000.	10:35
5	Somewhere in the 200,000 range.	10:35
6	Q You got my next question. So you financed	10:35
7	the purchase in 2010?	10:35
8	A Yes.	10:35
9	Q Do you recall what bank you obtained a	10:35
10	loan from originally in 2010?	10:36
11	A Wells Fargo.	10:36
12	Q In 2010?	10:36
13	A Yes.	10:36
14	Q Okay. Do you recall who you worked with	10:36
15	at Wells Fargo in 2010?	10:36
16	A No. I worked with, I guess a private loan	10:36
17	officer, so I am not sure. So maybe Wells Fargo	10:36
18	purchased the loan. I really don't remember.	10:36
19	Q When you say private loan officer, do you	10:36
20	mean a broker?	10:36
21	A Yes, or someone working in a brokerage.	10:36
22	Q So that I am clear, it seems like as we	10:36
23	have been talking your memory might have gone off a	10:36
24	little bit more.	10:37
25	So you don't think you obtained the loan	10:37

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1 in 2010 from Wells Fargo? 10:37

2 A I am not sure who or how the loan was 10:37

3 obtained. But as far back as I can remember, my 10:37

4 payments have been made to Wells Fargo. 10:37

5 Q Okay. Is that the same loan you currently 10:37

6 have on [REDACTED]? 10:37

7 A Yes, it is. 10:37

8 Q And what type of a mortgage product is 10:37

9 that? 10:37

10 A FHA. 10:37

11 Q What is the term of the loan? 10:37

12 A It is a 30-year. 10:37

13 Q Do you currently own any other properties 10:37

14 besides [REDACTED]? 10:37

15 A I do. 10:37

16 Q What properties are those? 10:37

17 A I own [REDACTED] in Bristol, 10:37

18 Connecticut. 10:37

19 Q Any others? 10:37

20 A No. 10:37

21 Q In 2020, did you own any other properties? 10:37

22 A Yes, in 2020, in addition to those two, I 10:37

23 also owned [REDACTED] in Plymouth, 10:38

24 Connecticut. 10:38

25 Q Let's start with [REDACTED], if you don't 10:38

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1	Q	Thomas?	11:08
2	A	Thomaston Savings Bank.	11:08
3	Q	Is that located here in Connecticut?	11:08
4	A	Yes.	11:08
5	Q	Why did you choose that bank?	11:08
6	A	My partner chose that one, but they are	11:08
7		smaller I think than Webster. But I think she --	11:08
8		they were in Watertown where I work and she lives,	11:08
9		and I don't know if she had some contacts or she	11:08
10		just liked that bank, but there was nothing wrong	11:08
11		with them.	11:08
12	Q	Is that account now closed?	11:08
13	A	Yes, it is.	11:08
14	Q	When did you first become a Wells Fargo	11:08
15		bank customer?	11:08
16	A	I have been a Wells Fargo bank customer	11:08
17		for longer than I think I can remember. They	11:08
18		purchased Wachovia. I was a Wachovia member, so	11:08
19		whenever that was.	11:08
20	Q	Do you have any other loans besides the [REDACTED]	11:08
21		[REDACTED] with Wells Fargo?	11:09
22	A	No.	11:09
23	Q	Do you have any credit cards with Wells	11:09
24		Fargo?	11:09
25	A	No.	11:09

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1	[REDACTED]	11:19
2	[REDACTED]	11:19
3	Q [REDACTED]	11:19
4	[REDACTED]	11:19
5	[REDACTED]	11:19
6	[REDACTED]	11:19
7	[REDACTED]	11:19
8	A [REDACTED]	11:19
9	[REDACTED]	11:19
10	[REDACTED]	11:19
11	[REDACTED]	11:20
12	[REDACTED]ed	11:20
13	[REDACTED]	11:20
14	[REDACTED]	11:20
15	[REDACTED]	11:20
16	[REDACTED].	11:20
17	[REDACTED]	11:20
18	[REDACTED]	11:20
19	A [REDACTED]	11:20
20	[REDACTED]	11:20
21	[REDACTED]	11:20
22	[REDACTED]	[REDACTED]:20
23	[REDACTED]	11:20
24	[REDACTED]	11:20
25	[REDACTED]	11:21

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1 I attempted to refinance. 11:21

2 Q And you said something about how since 11:21

3 Wells Fargo said no -- I don't want to put words in 11:21

4 your mouth. I thought you said something to the 11:21

5 effect of if Wells Fargo said no, there was no 11:21

6 reason to apply anywhere else? 11:21

7 A Yes, I felt Wells Fargo had treated me 11:21

8 fairly and gave me a no, then I just kind of -- I 11:21

9 just made the assumption that somebody else would 11:21

10 have said no also. 11:21

11 Q Do you recall the reasons for the decline? 11:21

12 A I didn't recall then. I do recall now. 11:21

13 Q Did you look at the denial letter 11:21

14 recently? 11:21

15 A I have seen the denial letter recently, 11:21

16 but that wasn't -- that wasn't where my 11:21

17 recollection stemmed from. 11:22

18 Q Where did your recollection stem from? 11:22

19 A So when I was deciding to refinance 11:22

20 [REDACTED], I did call the Wells Fargo lender 11:22

21 because it was a point of contact. And he 11:22

22 remembered my name, and he dug into our first 11:22

23 dealings and he is the one who said that he saw the 11:22

24 debt to income, and that was my first recollection 11:22

25 of it. 11:22

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1 Q The first Wells Fargo contact, who was 11:22
2 that? 11:22
3 A Brian Coughlin. 11:22
4 Q How did you know Brian? 11:22
5 A I only knew him through the October 2020 11:22
6 refinance attempt. He actually -- he cold-called 11:22
7 me, I think, and that is how I started dealing with 11:22
8 him. 11:23
9 Q In October or the fall of 2020? 11:23
10 A Yes. 11:23
11 Q So you didn't know Brian before you 11:23
12 applied in 2020? 11:23
13 A No, I did not. 11:23
14 Q Have you kept up with Brian since then? 11:23
15 A No. Only when going through that process, 11:23
16 but no. 11:23
17 Q Did you call him about [REDACTED]? 11:23
18 A Yes. 11:23
19 Q And that was -- if you can help me 11:23
20 remember. I can look through my notes. You 11:23
21 refinanced [REDACTED] this year, January, February? 11:23
22 A So I probably would have called him 11:23
23 December of '22 or January of '23. And I don't 11:23
24 know that I called him about any property 11:23
25 specifically. I think I was just going back to one 11:23

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1 of the last loan officers I dealt with and trying 11:23
2 to just discuss numbers to kind of get a feel for 11:23
3 what I could accomplish. 11:23

4 Q Okay. And how are your interactions with 11:23
5 Brian? Is he friendly, respectful? 11:24

6 A Yeah, both. 11:24

7 Q So in January or December of the recent 11:24
8 interactions, what caused him to look back at the 11:24
9 older deal? 11:24

10 A I think just we had talked a couple of 11:24
11 times. I think when he realized who I was, when I 11:24
12 told him we had spoken back in 2020, I think he 11:24
13 just went back into my file. In one of our 11:24
14 conversations, he brought that up. 11:24

15 Q When he said the reason for the decline in 11:24
16 October of 2020 was debt to income, what was your 11:24
17 reaction? 11:24

18 A I don't know. I think I just took it in 11:24
19 stride. I was more concerned with moving forward. 11:24

20 Q What I am getting after is, did that 11:24
21 reason seem inaccurate to you? 11:24

22 A No, I didn't take it as inaccurate when he 11:25
23 told me. 11:25

24 Q Okay. Does it seem inaccurate now? 11:25

25 MR. BLISS: Objection. Lack of 11:25

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11:49

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C E R T I F I C A T E

I hereby certify that I am a Notary Public, in and for the State of Connecticut, duly commissioned and qualified to administer oaths.

I further certify that the deponent named in the foregoing deposition was by me duly sworn and thereupon testified as appears in the foregoing deposition; that said deposition was taken by me stenographically in the presence of counsel and reduced to typewriting under my direction, and the foregoing is a true and accurate transcript of the testimony.

I further certify that I am neither of counsel nor related to either of the parties to said suit, nor of either counsel in said suit, nor am I interested in the outcome of said cause.

Witness my hand and seal as Notary Public the 18th day of October, 2023.



Notary Public

My Commission Expires:

November 30, 2027

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